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Adobe Systems Inc. and Intuit Inc.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

IN RE: HIGH-TECH EMPLOYEE
ANTITRUST LITIGATION

Master Docket No. 11-CV-2509-LHK

THIS DOCUMENT RELATES TO:

ALL ACTIONS

**DEFENDANTS ADOBE SYSTEMS
INC. AND INTUIT INC.'S
STATEMENTS REGARDING
REDACTIONS**

Defendants Adobe Systems Inc. and Intuit Inc. submit this statement in compliance with the Court's March 13, 2013 Case Management Order (Dkt. 350).

Counsel for Adobe and Intuit met and conferred with counsel for plaintiffs today, and agreed to the inspection process set forth below.

Adobe and Intuit produced approximately 230 documents and 150 documents, respectively, with redactions of nonresponsive material. These documents consist of Board of Director presentations, agenda, minutes, and other Board documents. The non-responsive information pertains to discussions of potential mergers and acquisitions, long term growth opportunities, individual restricted stock grant resolutions, audit committee matters and the like. By agreement of the parties, Intuit provided a Non-Responsive Redaction Log in November, 2012, and an additional log today for 69 documents produced yesterday. Plaintiffs did not request

1 a similar log for Adobe's redacted documents so Adobe has produced only a privilege log.

2 As noted, the process agreed on by counsel for plaintiffs and counsel for Adobe and Intuit
3 is that, upon request by plaintiffs' counsel, Adobe will promptly make these documents available
4 for review by plaintiffs' counsel without redacting the non-responsive information so that, if they
5 choose, plaintiffs' counsel can verify the appropriateness of the redactions.

6 Dated: March 14, 2013

JONES DAY

8 By: /s/ Robert A. Mittelstaedt

9 Robert A. Mittelstaedt

10 Attorneys for Adobe Systems Inc. and Intuit
11 Inc.

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